

**REMARKS/ARGUMENTS**

Claims 1-2, 4, 16 and 25 have been amended by this Response. Claim 10 has been previously cancelled. Claims 1-9 and 11-30 are currently pending in this application and are at issue herein.

**§ 102 Claim Rejections**

Claims 1-5, 7-9, 11-23 and 25-27 stand rejected under § 102(e) as anticipated by U.S. Publication No. 2003/0120571 to Blagg ("Blagg"). Applicants respectfully traverse the claim rejections for at least the following reasons.

Blagg discloses a method for grouping accounts in order to better manage financial transactions. Accounts for different products (*e.g.*, VISA™, MASTERCARD™, DISCOVER™, etc.) in Blagg are linked together to create a group so that group processing can be performed at the group level, while still retaining independent processing of the accounts at the account level. In Blagg, accounts are linked into a group by linking a financial record for each account to group master data record for that group. Typically, a group will include a key account and one or more dependent accounts. The strategy for the dependent accounts is to specify an authorization option therefore and specify the information that is used to authorize a transaction. Payment for a dependent account is credited in Blagg depending upon who pays the invoice. For instance, if the dependent account holder, which may be a son or daughter, pays the invoice, then the dependent cardholder account is credited. On the other hand, if the dependent account is paid by the key account holder, or the primary

owner, then the amount of the payment is credited to the dependent account depending upon the control settings for the group and the amount of the payment.

In Blagg, group credit lines are also available across all participating group members. Authorization options for transactions in Blagg include: (1) considering the credit line and available credit of the entire group; (2) considering only the credit line and available credit of the dependent account; or (3) considering the credit line and available credit of the group and the dependent account. Thus, in Blagg, purchases may be made over and above an individual's line of credit and available credit if he/she is a member of a group and the group line of credit and available credit are used to authorize transactions.

The group processing in Blagg allows payments to be processed at the group level. For instance, if a payment is recognized as a group payment, it will be allocated across all participating accounts in the group in percentages according to account participation in the group. Additionally, reward points offered by the various products may be pooled. Depending on the strategy chosen, reward points for a dependant account may be pooled together or maintained at the individual account level.

Blagg discloses a system and method which allows independent accounts from different types of credit cards to be grouped together for ease of processing. The accounts may be grouped together to determine lines of group credit and payments may be made to individual accounts or applied to all accounts as a group payment.

Conversely, independent claims 1 and 16 recite a system for the payment of petty cash disbursements which includes establishing a private network for managing such payments. In accordance with the present invention, a plurality of master purchasing

card accounts are set up within the private network, with each of the master purchasing accounts linked to a different bank account. These master purchasing accounts are typically set up by different entities for different purposes. Pluralities and/or levels of subordinate purchasing card accounts are set up within the private network and are linked to either the master purchasing account or to a higher level subordinate purchasing card account. The owner of the bank account has authority to authorize a transfer of funds to the master purchasing card account to cover purchases made using that master purchasing card account or any subordinate purchasing card accounts linked, either directly or indirectly, to that master purchasing card account. The owner of the master purchasing card account can then authorize limits to each account subordinate thereto. Subordinate purchasing card accounts may also authorize limits to purchasing card accounts that are subordinate to them.

In accordance with the present invention, when a purchasing card account attempts to make a transaction, the authorization for that transaction is determined by the amount of funds available and remaining to that particular card account. There is no grouping of credit lines. For example, a master purchasing card account may allocate \$10,000 to a subordinate purchasing card account. That subordinate purchasing card account may spend that money or allocate all or some of it to accounts subordinate thereto. Once the \$10,000 is spent, however, the subordinate purchasing card account will need to go back to the master purchasing card account and request additional funds. All payments made for purchases made by the master purchasing card account or any accounts subordinate thereto come from the bank account originally linked to that master

purchasing account. Unlike Blagg, there is no group line of credit, no group processing of payments, and no group redeeming of reward points in the present invention.

Further, since there is a private network managing the payment of petty cash disbursements, and each of the master purchasing card accounts and subordinate purchasing card accounts are set up within the private network, the cards associated with any of the subordinate purchasing card accounts are linkable and unlinkable, directly or indirectly, and thus reusable, with any master purchasing card account set upon within the private network. For example, Company ABC may set up a master purchasing card account for financing a movie or other endeavor. Company X may have a subordinate purchasing card account set up within the private network and linked to the master purchasing card account of Company ABC. Company X, after a time, may be finished with the work it is doing for Company ABC and wish to seek work from other companies. Company DEF may also have a master purchasing card account set up within the private network and linked to a different bank account than that of Company ABC. Company DEF is totally unrelated to Company ABC and may be financing a different movie or other endeavor. Company X, in accordance with the present invention, may take the very same card it used when doing business with Company ABC and link that card as a subordinate purchasing card account to Company DEF. In the present inventive system, a new card does not have to be issued. Rather, Company X can take the very same card it had been using when associated with Company ABC and simply have new funds allocated to it by Company DEF. Of course, Company X would first have to delink its card from Company ABC and then link its card with Company DEF, since a card can only be associated with one master purchasing account at a time.

Any purchases made by Company X when linked to Company DEF will be debited to the bank account associated with Company DEF. In this manner, each time a company wishes to engage freelancers as subcontractors, it does not have to issue additional cards each time it wishes to do business. Rather, once a company is set up within the private network established by inventive system, the cards may be associated and disassociated with various companies, and in this manner petty cash disbursements may be readily managed.

Similarly, independent claim 25 recites a method for the payment of petty cash disbursements which includes establishing a private network for the payment of petty cash disbursements, establishing an account at a bank associated with the private network, linking at least one master purchasing card account set up within the private network to the bank account, and linking one or more subordinate purchasing card accounts also set up within the private network to one of the master purchasing card accounts or to other subordinate purchasing card accounts. Independent claim 25 also recites that the cards associated within any of the subordinate purchasing card accounts are linkable with any of the master purchasing card accounts set up within the private network, and may only be linked with one master purchasing card account at a time.

Blagg includes no teaching or suggestion of setting up a private network for managing petty cash disbursements. In Blagg, each individual cardholder is issued their own card and there is no teaching or suggestion of cards being reusable in the form of linking and unlinking to various master purchasing card accounts or subordinate purchasing card accounts for further allocation of new funds. Blagg discloses a system and method which allows independent accounts from different types of credit cards to be

grouped together for ease of processing. Basically, the cards identified in Blagg are typical credit cards and should a company or individual wish to have a credit card associated with a new entity it will simply need to be issued a new card.

Accordingly, Applicants submit that independent claims 1, 16 and 25 are allowable over Blagg.

Claims 2-5, 7-9, 11-15, 17-23 and 26-27 depend cognately from independent claims 1, 16 or 25 and add features which further remove the present invention from the prior art. Given at least the distinctions identified above, the dependent claims are believed allowable over the prior art and a separate discussion of them will not be belabored for the sake of brevity.

### **§ 103 Claim Rejections**

Claim 6 and 16-30 stand rejected under § 103(a) as obvious over Blagg in view of U.S. Patent No. 6,581,035 to Madan et al. ("Madan"). Applicants respectfully traverse the claim rejections for at least the following reasons.

Madan has been cited as disclosing the use of voice recognition software to accomplish transactions. The deficiencies of Blagg with respect to independent claims 1, 16 and 25 have been previously noted. Madan, which is directed toward the use of voice recognition software for authorizing transactions, includes no disclosure or suggestion of any type of private network for managing financial transactions and linking and unlinking cards to various master/subordinate purchasing card accounts which may be owned by completely different entities. Accordingly, claims 6 and 16-30 are believed allowable over the prior art.

**Conclusion**

For at least the above-identified reasons, Applicants submit that claims 1-9 and 11-30 are allowable over the prior art of record. Reconsideration of pending claims 1-9 and 11-30, allowance and passage to issue are respectfully requested. Early notification to that effect is respectfully requested.

The Commissioner is hereby authorized to charge any underpayment or credit any overpayment associated with this communication to Deposit Account No. 02-4800. Should any issues remain, the Examiner is invited to contact the undersigned at the number listed below to advance prosecution of the case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Bryan H. Opalko', followed by a long horizontal line extending to the right.

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Bryan H. Opalko  
BUCHANAN INGERSOLL & ROONEY PC  
Reg. No. 40,751  
One Oxford Centre  
301 Grant Street, 20th Floor  
Pittsburgh, Pennsylvania 15219  
ph: (412) 562-1893  
fx: (412) 562-1041  
e-mail: bryan.opalko@bipc.com  
Attorney for Applicants